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*Counsel to the Ad Hoc Group
of Senior Unsecured Noteholders*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
In re	:	Chapter 11
	:	
WALTER INVESTMENT MANAGEMENT	:	Case No. 17-13446-JLG
CORP.,	:	
	:	
Debtor.	:	
-----X	:	

**VERIFIED STATEMENT OF AD HOC GROUP OF SENIOR UNSECURED
NOTEHOLDERS OF WALTER INVESTMENT MANAGEMENT CORP.
PURSUANT TO BANKRUPTCY RULE 2019**

Milbank, Tweed, Hadley & McCloy LLP (“Milbank”) hereby makes the following verified statement (the “Verified Statement”) pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rule 2019) in connection with Milbank’s representation of an ad hoc group (the “Ad Hoc Group”) of those certain beneficial holders (the “Senior Noteholders”) of the 7.875% senior notes due 2021 (the “Senior Unsecured Notes”) issued pursuant to that certain indenture dated as of December 17, 2013, by and among Walter

Investment Management Corp. (the “Debtor”), the guarantors and Wilmington Savings Fund Society, FSB, a national banking association, as successor trustee:

1. In or around March 2017, the Ad Hoc Group retained Milbank to represent the Ad Hoc Group with respect to the Senior Unsecured Notes. From time to time thereafter, certain Senior Noteholders have joined the Ad Hoc Group.

2. The members of the Ad Hoc Group hold disclosable economic interests or act as investment managers or advisors to funds and/or accounts that hold disclosable economic interests in relation to the Debtor. In accordance with Bankruptcy Rule 2019 and based upon information provided to Milbank by each member of the Ad Hoc Group, attached hereto as Exhibit A is a list of the names, addresses, and the natures and amounts of all disclosable economic interests of each present member of the Ad Hoc Group relation to the Debtor.

3. Nothing contained in this Verified Statement (or the exhibit hereto) should be construed as a limitation upon, or waiver or, any rights of any member of the Ad Hoc Group to assert, file, and/or amend any claim or proof of claim filed in accordance with applicable law and any orders entered in these cases.

4. Milbank reserves the right to amend this Verified Statement as necessary in accordance with the requirements set forth in Bankruptcy Rule 2019.

Dated: December 4, 2017
Los Angeles, California

MILBANK, TWEED, HADLEY & M^cCLOY LLP

/s/ Gregory A. Bray

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EXHIBIT A¹

<u>Name and Address</u>²	<u>Nature and Amount of Disclosable Economic Interests</u>³
Canyon Capital Advisors LLC 2000 Avenue of the Stars Los Angeles, CA 90067	Senior Notes: \$56,160,000 Term Loans: \$24,121,000
CQS (UK) LLP 4 th Floor, One Strand London, WC2N 5HR England	Senior Notes: \$31,750,000 Term Loans: \$18,507,108
Deer Park Road Management Company, LP 1195 Bangtail Way Steamboat Springs, CO 80487	Senior Notes: \$43,400,000 Convertible Notes: \$2,000,000
Lion Point Capital, LP 250 W 55 th Street, 33 rd Floor New York, NY 10019	Senior Notes: \$32,324,000 Convertible Notes: \$21,200,000
Oaktree Capital Management, L.P. 333 S. Grand Avenue, 28 th Floor Los Angeles, CA 90071	Senior Notes: \$46,985,000
Omega Advisors, Inc. 810 Seventh Avenue, 33 rd Floor New York, NY 10019	Senior Notes: \$126,930,000 Term Loans: \$53,430,000

¹ Nothing in the Statement and Exhibit A affects the substantive rights of each member of the Ad Hoc Group to assert claims against the Debtor's estate, including under any bar date order. In addition to the disclosable economic interests identified herein, members of the Ad Hoc Group may have additional claims against the Debtor on account of, among other things, fees, expenses, accrued interest, and indemnity obligations.

² The institutions in this column manage or advise certain funds and accounts that hold the economic interests listed.

³ To the best of Milbank's knowledge, the information included herein is accurate as of December 1, 2017. The amounts set forth herein include only outstanding principal and do not include accrued or unpaid interest or other amounts that may be owing under the applicable debt documents. Certain figures may include trades that had not closed as of December 4, 2017.